

UNITED STATES DISTRICT COURT

for the
District of
Division

Daniel L Chase

) Case No.

(to be filled in by the Clerk's Office)

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint.
If the names of all the plaintiffs cannot fit in the space above,
please write "see attached" in the space and attach an additional
page with the full list of names.)

-v-

Daniel L. Chase

Jury Trial: (check one) ☒ Yes No

Defendant(s)

Jeffrey Kinney, Steven Buzzell, David Farrar,
Michael Pina, Dylan Hall, Daniel Place.

COMPLAINT FOR A CIVIL CASE

I. The Parties to This Complaint

A. The Plaintiff(s)

Name	Daniel L Chase
Street Address	177 Brann Road
City and County	Levant Penobscot county
State and Zip Code	Maine 04456
State and Zip Code	(207) 217-9768
E-mail Address	Chase4rep@gmail.com

B. The Defendant(s)

Defendant No. 1

Name	Jeffrey Kinney
	Police officer
	240 Main street
	Bangor Penobscot County
	Maine 04401
	(207) 947-7382
	bangor.police@bangormaine.gov

Defendant No. 2

David Farrar
officer
240 Main street
Bangor Penobscot County
Maine 04401
(207) 947-7382
bangor.police@bangormaine.gov

Defendant No. 3

Steven Buzzell
deputy
85 Hammond Street Bangor ME 04401
Bangor Penobscot County
Maine 04401
(207) 947-4585

Defendant No. 4 and more

Michael Pina, Dylan Hall, Daniel Place
officers
240 Main street
Bangor Penobscot County
Maine 04401
(207) 947-7382
bangor.police@bangormaine.gov

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case.

What is the basis for federal court jurisdiction? **X Federal question**

A. If the Basis for Jurisdiction Is a Federal Question list the specific federal statutes etc.

1st amendment, 4th amendment, 5th amendment, 8th amendment, 9th amendment, 10th amendment, 11th amendment, 13th amendment, 14th amendment, 18 USC § 241, 18 USC § 242, the RICO act 18 USC CHAPTER 96, 18 USC § 1503, 18 USC § 1510, 18 USC § 1511, 18 USC § 1512, 18 USC § 1546, 18 USC § 1951, and 18 USC § 1957, 18 U.S. Code § 1962, 42 USC § 1985, The Americans with Disabilities Act of 28 CFR § 35, including but not limited to: 28 CFR § 35.104, 28 CFR § 35.105, 28 CFR § 35.130, 28 C.F.R. § 35.139 and 28 CFR § 35.160, and 29 USC § 794, 42 U.S. Code § 12101, 104 Stat. 328, Pub. L. 110-325, § 3, Sept. 25, 2008, 122 Stat. 3554. the Declaration of Independence, etc.

3. The Amount in Controversy

1. \$50,000,000 for pain, suffering, and intentional infliction of emotional distress.
2. \$75,000,000 in punitive damages for committing acts of torture.
3. \$100,000,000 in punitive damages for falsifying evidence or destroying evidence.
4. \$500,000,000 in punitive damages for violating Brady/Giglio by withholding evidence.
5. \$150,000,000 in punitive damages for the conspiracy to falsify 2 police reports between BPD officer Kinney and deputy Buzzell.
6. \$50,000,000 in punitive damages for officer Kinney act of witness tampering,
7. \$250,000,000 in punitive damages for the officers violating Mr. Chase's due process rights.
8. \$200,000,000 in punitive damages for repeatedly and maliciously violating multiple ADA rights.
9. The statutory declared amount of damages for each and every individual violation of ADA rights.
10. \$200,000,000 in punitive damages under Rico for officers declaring intent to murder Mr. Chase.
11. \$100,000,000 in punitive damages for the police investigation that refused to acknowledge apparent and covered up police misconduct.
12. \$20,000 + for required expert fees. The final amount yet to be determined.

III. Statement of Claim

This happened at or around 1850 Broadway in Bangor Maine on or about 4-16-2018 after 19:00.

1. Mr. Chase who has a fused spine was repeatedly assaulted by multiple Bangor officers instead of receiving answers as effective ADA communications for his nonverbal learning disability.
2. Mr. Chase asked Kinney why at least 16 times in 3 minutes time during which he was abused without receiving his ADAAA mandated *effective communications* answer.
3. Mr. Chase's fused spine was repeatedly injured. Bangor police officers and Deputy Buzzell used sufficient force to cause temporarily paralysis despite Mr. Chase declaring he has "6 fused vertebrae" and in panic "I can't put my hands back there" implicitly requesting handcuff use in front of Mr. Chase.
4. Mr. Chase's comprehension issues needed ADA effective communication not physical assault. All officers have the ADA mandate to be handicap aware and accommodative. Arriving officers violated their ADA and police power duties to 1, assess the situation, 2. act to ensure potential disabilities are accommodated, and then 3. to protect Mr. Chase against abusive officers including themselves by using extreme measures of protective force when necessary to ensure the disabled rights are not violated.
5. BPD officer(s) showing their guilty minds falsified, destroyed, or withheld dashcam evidence against Brady/Giglio. Jeffrey Kinney falsified his police report a class B crime per 17-A M.R.S.A §702 and a class D crime per 17-A M.R.S.A §509 while trying to cover up Kinney's crimes against Mr. Chase.
6. ADA effective communications were denied by failure to communicate all evidence to Mr. Chase without falsification.
7. Jeff Kinney committed perjury at a trial regarding this incident completely destroying his credibility.
8. Jeff Kinney's police report declares Kinney recorded the entirety of the stop. Yet Kinney's body mic. on the trip to jail was turned off thereby attempting to destroy evidence critical to Mr. Chase's defense.

Several minutes of recording from Kinney's body mic. when Jeffrey Kinney asked Mr. Chase about receiving medical attention where Mr. Chase said "as long as you're paying for it let's go" and the part where Jeffrey Kinney denied Mr. Chase his requested and required medical attention are deleted.

9. Kinney and Deputy Buzzell both appear to mislead in their reports as both are incorrect in their claims of the sequence of events compared to the transcripts made from police dashcam recordings.

10. BPD officers declared their intention to murder Mr. Chase AFTER Mr. Chase had almost been suffocated by BPD officers.

11. Mr. Chase was denied his ADA right to use his crutch while going to the cruiser.

12. Mr. Chase's crutch was left in the back seat of his grand marquis instead of being brought to jail.

13. BPD officers committed multiple violations of the RICO act in this case.

14. Problems arose when law enforcement officials encountered Mr. Chase who cannot communicate as officers might expect due to his cognitive disabilities. Kinney caused Mr. Chase much stress before and during Kinney's unjustified, unlawful, and arbitrary use of force proving BPD engages in structural discrimination against the cognitively impaired which is based on ineffective policy, training, and Kinney's own failure to uphold his responsibility to reasonably accommodate all disabilities.

15. Kinney refused to accept a handicap plate combined with Mr. Chase's agonizing cries of pain from Kinney's manhandling and a declared disability of "6 fused vertebrae" as ADA recognized disabilities.

16. Mr. Chase was denied his ADA right to be handcuffed in front on the way to jail instead of having his arms bound behind him causing agony every single second Mr. Chase was inside the cruiser.

17. The State of Maine had previously surrendered its jurisdiction over Mr. Chase 2 different ways; fraud and denial of protection.

18. BPD officers at the scene that night knew how to de-escalate a situation and how to communicate to those with cognitive defects but made the choice to be aggressors and ineffective communicators. <https://www.bangormaine.gov/content/318/354/1134/1164.aspx> As of 2017 83% of Bangor Police Officers are trained in mental health and crisis de-escalation. 65% of those... in Crisis Intervention.

19. BPD officers by immediately jumping on top of Mr. Chase after they arrived instead of taking time to assess the situation for the existence of a significant threat, while presuming the existence of cognitive disabilities and physical disabilities in Mr. Chase did not apply ADA requirements that are designed to protect the disabled against abusive police officers.

20. BPD officers did not apply ADA requirements by not acting as though Mr. Chase had multiple disabilities as acting under that presumption is the only way the disabled may have ADA rights upheld.

21. The multiple violations of withholding, destroying, or modifying evidence along with witness intimidation portrays a pattern of racketeering activities in violation of the RICO act.

22. The multiple violations of Mr. Chase's ADA rights such as not providing federally guaranteed effective communications, and reasonable accommodations such as allowing Mr. Chase to use his

crutch to get to the cruiser, and to have his hands cuffed in front by multiple BPD officers deprived Mr. Chase of his federally guaranteed rights in violation of the ADA and RICO act.

23. Jeffrey Kinney falsified his dashcam recording and viewed it after falsification.

IV. Relief

Because these men work for the same corporation with repeated violations of the RICO act by multiple employees or officers. Mr. Chase calls for that corporations corporate charter to be revoked according to the doctrine of nonuser or misuser. Whereas these officers have committed multiple crimes a federal investigation and prosecution is in order.

1. A permanent restraining order against the city of Bangor preventing every one of its officers from coming into contact with Mr. Chase again for any reason.
2. A federal investigation ordered to examine and remove BPD corruption.
3. I want the Court to order federal prosecutions of BPD officers for federal crimes and violations.
4. I want the Court to order the Maine A.G. to investigate or charge BPD officers with violations of state laws such as witness tampering, filing a false police report, and falsifying evidence.
5. I want a Court order reversing the plea made under duress and witness intimidation; based on evidence tampering and falsified police reports; based on Maine Supreme Judicial Court and District Courts engaging in legal malpractice, all of which violated Mr. Chase's due process, equal protection or other rights such as those existing under Brady/Giglio.
6. I want BPD to institute autism recognition and response training.
7. I want BPD and the State of Maine to institute guardian model police training. I want aggression based police training to be outlawed for all police in Maine and for the entire first circuit. Aggression style training teaches cadets to use force not reason thus denying every citizen the right to be physically safe when police officers are in the vicinity.
8. I want BPD to require deescalation techniques be taught and used as its primary interaction tool.
9. I want BPD to be Court ordered to fire any officers that act like bullies when interacting with people. The so called "command presence" is seen as a threat by those with autism and other cognitive impairments which must be modified or removed to be autism or ADA compliant.
10. I want BPD to outsource its dashcam and other video to a private business not affiliated with police in any way including prior job experience. This is required to prevent future dashcam fraud by BPD officers.
11. I want internal affairs investigations to be removed from BPD. I want the Court to mandate a Maine agency be created to investigate all allegations of police misconduct anywhere in Maine. This is required to remove internal bias of some police departments to pronounce an officers guilt. Police may cover up crimes they know officers have committed.
12. I want all police internal affairs to be declared a violation of the 9th and 10th amendments that requires open investigations for everyone suspected of a crime. Equal protection under the law

- and outside prosecutors instead of a totally separate and special treatment for fellow officers whenever an officer is charged with criminal, civil, legal, or rights violation is mandated.
13. I want the Court to order BPD be investigated to determine appropriate RICO charges.
 14. I want the BPD charter revoked for operating outside its corporate charter. It has corrupt officers that are beyond redemption. I understand the doctrines of nonuser or misuser have required removal of the corporate charter of other corrupted organizations.
 15. I want every officer involved in my torture charged with acts of terrorism.
 16. I want \$400,000,000 for pain, suffering, violations of Brady/Giglio and falsified police reports, torture, emotional distress, and for punitive damages to prevent other officers from declaring intent to murder and to cover up crimes committed by their fellow officers nationwide.
 17. A Court mandate for police officers to answer why police stop someone when asked.
 18. A Court mandate requiring all police officers to honestly and accurately explain the reason and level of voluntariness involved during and for *all police-civilian encounters including but not limited to traffic stops* as soon as the encounter begins.
 19. An investigation into the Maine Judicial Branch to determine how many acts of sedition have been committed by its judicial officers against the United States of America.
 20. A federal takeover of the Maine Judicial branch in its entirety.
 21. \$50,000,000 for pain, suffering, and intentional infliction of emotional distress.
 22. \$75,000,000 in punitive damages for committing acts of torture.
 23. \$100,000,000 in punitive damages for falsifying evidence or destroying evidence.
 24. \$500,000,000 in punitive damages for violating Brady/Giglio by withholding evidence.
 25. \$150,000,000 in punitive damages for the conspiracy to falsify 2 police reports between BPD officer Kinney and deputy Buzzell.
 26. \$50,000,000 in punitive damages for officer Kinney act of witness tampering.
 27. \$250,000,000 in punitive damages for the officers violating Mr. Chase's due process rights.
 28. \$200,000,000 in punitive damages for knowingly or repeatedly violating multiple ADA rights
 29. The statutory declared amount of damages for each and every individual violation of ADA rights.
 30. \$200,000,000 in punitive damages under Rico for officers declaring intent to murder Mr. Chase.
 31. \$100,000,000 in punitive damages for the police investigation that refused to acknowledge apparent and covered up police misconduct.
 32. \$20,000 + for required expert fees. The final amount yet to be determined.

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

I Daniel L Chase have to include some words to protect myself. I have no clue what your rules of Court are trying to tell me. They use strange words from 3 languages I do not know (Latin, Legal French, and the specialty language of the Court known as Legal English) and use confusing phrasing to make communications coming from the Court even more unintelligible. I am not sure based on the phrasing of this form and the rules of Court if I provided the information that is requested or not. I do not know why you asked for the same things 2 different times that was repeated at the end of the relief section.

I am not sure if I need to include evidence at this time or not or not. It sounds like you want the evidence to be presented at a later time not now. Even worse no one working for the Court will explain the forms requirements. To the best of my ability considering the limitations imposed by my nonverbal learning disability, comprehension issues, and other cognitive defects I have answered this form as I understand its requests according to the words used in your form. I could not even figure out how to stay within your forms computer designed lines and boxes so I had to reformat the form into a simple text file to save hours of my time while filling this out because the text kept moving and changing position on me.

I move the Court to provide the opportunity to have an oral exchange that will allow me to explain my claims to ensure this complaint has been properly and completely introduced. I remain very confused by the Courts requirements and language. I have sometimes thought I have spoken clearly and completely when the opposite has been proven to be true. If the Court needs more evidence at this time I move the Court to request it. I am lost and confused as to what to do to satisfy your requirements. I normally check my mail once every 1-2 months unless I am expecting something to arrive sooner. I move the Court and opposing council to call me to ensure effective communications happen instead of expecting me to check the mail more often.

Date of signing: 10/26/2020

Signature of Plaintiff:

Daniel L Chase

Printed Name of Plaintiff: Daniel L Chase